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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

BOBBY CUSTARD JR.,

Defendant.

Case:2:20-cr-20605
Judge: Steeh, George Caram
MJ: Stafford, Elizabeth A.
Filed: 12-16-2020 At 10:32 AM
INDI USA V. BOBBY CUSTARD JR (DA)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(18 U.S.C. § 2119(1) - *Carjacking - Motor Vehicles*)

That on or about October 29, 2020, in the Eastern District of Michigan, Southern Division, the defendant, BOBBY CUSTARD JR., did, with the intent to cause death or great bodily harm, take a 2019 Dodge Challenger that had been transported, shipped, and received in interstate and foreign commerce from the person or presence of another, and did so by force, violence and intimidation, all in violation of Title 18, United States Code, Section 2119(1).

COUNT TWO

(18 U.S.C. § 924(c)(1)(A)(ii) - *Brandishing a Firearm
During and in Relation to a Crime of Violence*)

That on or about October 29, 2020, in the Eastern District of Michigan, Southern Division, the defendant, BOBBY CUSTARD JR., did intentionally use, carry, and brandish a firearm, during and in relation to the commission of a crime of violence for which he may be prosecuted in a court of the United States, that is, Carjacking, as alleged in Count One of this indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii).

COUNT THREE

(18 U.S.C. § 2119(1) - *Carjacking - Motor Vehicles*)

That on or about November 4, 2020, in the Eastern District of Michigan, Southern Division, the defendant, BOBBY CUSTARD JR., did, with the intent to cause death or great bodily harm, take a 2017 Dodge Challenger that had been transported, shipped, and received in interstate and foreign commerce from the person or presence of another, and did so by force, violence and intimidation, all in violation of Title 18, United States Code, Section 2119(1).

COUNT FOUR

(18 U.S.C. § 924(c)(1)(A)(ii) - *Brandishing a Firearm
During and in Relation to a Crime of Violence*)

That on or about November 4, 2020, in the Eastern District of Michigan,

Southern Division, the defendant, BOBBY CUSTARD JR., did intentionally use, carry, and brandish a firearm, during and in relation to the commission of a crime of violence for which he may be prosecuted in a court of the United States, that is, Carjacking, as alleged in Count Three of this indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii).

FORFEITURE ALLEGATION

Pursuant to Fed.R.Cr.P. 32.2(a), the government hereby provides notice to the defendants of its intention to seek forfeiture of all proceeds, direct or indirect, or property traceable thereto, all property that facilitated the commission of the violations alleged, or property traceable thereto, and all property involved in, or property traceable thereto, of the violations set forth in this Indictment.

THIS IS A TRUE BILL.

Dated: December 16, 2020

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

MATTHEW SCHNEIDER
United States Attorney

MATTHEW A. ROTH
Chief, Major Crimes Unit

s/Barbara K. Lanning
BARBARA K. LANNING
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, MI 48226-3211
(313) 226- 9103
barbara.lanning@usdoj.gov

United States District Court
Eastern District of Michigan**Criminal Case Cover**

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>BL</i>

Case Title: USA v. BOBBY CUSTARD JR.County where offense occurred : WayneCheck One: ☒ Felony☐ Misdemeanor☐ Petty☐ Indictment/ ☐ Information --- no prior complaint.☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 20-mj-30486]☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information**

Superseding to Case No: _____ Judge: _____

☐ Corrects errors; no additional charges or defendants.☐ Involves, for plea purposes, different charges or adds counts.☐ Embraces same subject matter but adds the additional defendants or charges below:Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

December 16, 2020

Date

Barbara K. Lanning
Assistant United States Attorney

211 W. Fort Street, Suite 2001

Detroit, MI 48226-3277

Phone: (313) 226-9103

Fax: (313) 226-2372

E-Mail address: barbara.lanning@usdoj.gov

Attorney Bar #: P79186

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.